

Citizens Banking Company Privacy Policy

The Citizens Banking Company and its employees understand the importance of protecting the personal privacy of its individual customers. We value the customer's relationship and intend to maintain their continued faith and trust. Accordingly, we commit to keeping their information secure and confidential. To do so, the bank regularly reviews its privacy and security practices and has developed a set of guidelines to follow. The bank will adhere to the privacy policies and practices as described if our customer(s) decides to close their account or become inactive.

System Security

One way that the bank protects our customer's information is by maintaining security standards and procedures that comply with federal guidelines. The bank's system security is designed to prevent unauthorized access to customer information. The bank regularly reviews and assesses new technology for protecting the integrity of our customer's information. The bank has specific procedures that limit access to customer information. Our employees must have a legitimate business reason to access or use any customer information. Through ongoing training, the bank emphasizes to its employees the importance of our customer's privacy.

Information Collection

In the course of processing transactions and providing service, the bank collects, retains and uses information about its customers. This information often includes certain "nonpublic" information that may be obtained in connection with providing a financial product or service. Nonpublic personal information includes information like account balances, investments, income, payment history and overdraft history.

Information may be collected from the following sources:

- Information from applications, other requests, or forms completed for loans, service, accounts, investments and insurance products;
- Information about transactions with the bank, affiliates or service providers and others; and
- Information received from third parties such as title companies, appraisers and credit bureaus.

The information is collected, used and retained so the bank can transact business, and provide and offer other products and services. The bank will work very hard to insure the accuracy of information. The bank encourages its customers to contact the bank if their information is incomplete or inaccurate.

Information Sharing

The Citizens Banking Company will not disclose nonpublic personal information about its customers or former customers to nonaffiliated third parties, except as permitted by law. The bank also will not share personal information with nonaffiliates so they can market to our customers. The bank works with a variety of third parties to offer financial services. The bank discloses information as necessary to fulfill these third party service arrangements. The information that may be shared includes certain nonpublic personal information as described under the heading “Information Collection” above. The bank limits the ways it shares information to the purposes permitted by law. The permissible information sharing exceptions fall into three categories:

- Servicing and Joint Marketing: The bank shares information with companies that perform services on its behalf, like check printers. It also shares information with companies that are hired to help market bank products and services. This enables the bank to offer a broader selection of product and service options to help our customers achieve their financial goals when the bank contracts with select financial institutions that offer financial services. Any information

shared for servicing or joint marketing is pursuant to an agreement with the third party that requires them to adhere to strict confidentiality terms. They are not permitted to use information provided to them for any purpose whatsoever other than for the specific reason it was provided to them by the bank.

- Processing and Servicing Transactions: Information is shared, as necessary, to service and process financial products and services that are requested by the customer, such as wire transfers or loan applications. Information also is shared in connection with maintaining and servicing accounts, such as statement preparation, complaint resolution, or debt collection.
- Other Lawful or Required Purposes: This category includes a variety of permissible sharing situations, such as when a customer makes a request or consents to have information shared, or when the bank shares information with auditors, attorneys or accountants, government regulators, in response to subpoenas, and other circumstances where sharing information is permitted or required by law.

Because the bank already limits the sharing of nonpublic personal information as outlined above, no action is required on the part of the bank's customers to limit such sharing.

The bank will not share information about its customers or former customers' transactions and experiences with affiliates for everyday business purposes. The bank also will not share information about customers or former customers' creditworthiness with the bank's affiliates for everyday business purposes. The bank will not share with nonaffiliates for marketing purposes.

The Compliance Council and Board of Directors shall review and approve this policy at least annually or more frequently if warranted, making such revisions and amendments, as it deems appropriate.